



DOCKET FILE COPY ORIGINAL

Mix 103.7**Talk**
Radio 1360 kkbj

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Midwest
Cable Promotions

July 13, 1999

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JUL 20 1999

Office of the Secretary
FCC
445 12th Street Southwest
TW-A325
Washington D.C. 20554

FCC MAIL ROOM

Re: Comments on RM-99-25 proposed LPFM service

Although there may be a need for a LPFM service, the FCC should understand that the potential for out right interference to broadcast services will be great. Also, the potential for abuse of this service clearly needs to be looked into.

Please accept these comments from a veteran broadcaster:

- 1.) Set aside only certain FM channels for LPFM (87.5-87.9).
- 2.) The LPFM should be strictly a non-commercial service. This would limit abuse and still provide for church groups and local programming.
- 3.) Maximum power should be limited to 10 watts. A well engineered 10 watt station will cover 15 miles from a 100 foot tower site with a listenable signal. LP-1000's will be a disaster and a spectrum abuse.
- 4.) Translators should not be allowed since one could literally cascade across the whole country.
- 5.) All second and third adjacent channels should be protected to commercial or non-commercial broadcasters.
- 6.) Each station should be licensed and require frequency coordination and a

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construction permit.

- 7.) No national ownership or group ownership, a corporation could control hundreds of these. One - Two - LPFM licenses to an owner.
- 8.) Networking would not be allowed.
- 9.) FCC type accepted equipment only.
- 10.) Auxiliary services should not be accessible to LPFM.

Lastly, the FCC should have a firm plan in place before this LPFM is released. We don't want another LPTV log jam that ended up in a total failure. I personally feel that LPFM will end up the same way for the same reasons. Broadcasting costs big money to keep operational. LPFM will not be able to compete in dollars.

Thank you for your cooperation and understanding in this matter.

Sincerely,

Roger Paskvan
R. P Broadcasting, Inc.

RP/vp